

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

ALANA MARIE SOUZA a/k/a ALANA CAMPOS, BROOKE JOHNSON a/k/a BROOKE TAYLOR, CIELO JEAN GIBSON a/k/a CJ GIBSON, CLAUDIA SAMPEDRO, EVA PEPAJ, JAIME EDMONDSON-LONGORIA a/k/a JAIME LONGORIA, JAMILLETTE GAXIOLA, LAURIE YOUNG a/k/a LAURIE ROMEO, LUCY PINDER, and MASHA LUND a/k/a MALU LUND,

Plaintiffs,

- against -

CONTROVERSY, LLC and MARK LATORRE,

Defendants.

Case No. 2:19-cv-00691-JFC

**MOTION FOR EXTENSION OF TIME
TO COMPLETE SERVICE**

ELECTRONICALLY FILED

Plaintiffs ALANA MARIE SOUZA a/k/a ALANA CAMPOS, BROOKE JOHNSON a/k/a BROOKE TAYLOR, CIELO JEAN GIBSON a/k/a CJ GIBSON, CLAUDIA SAMPEDRO, EVA PEPAJ, JAIME EDMONDSON-LONGORIA a/k/a JAIME LONGORIA, JAMILLETTE GAXIOLA, LAURIE YOUNG a/k/a LAURIE ROMEO, LUCY PINDER, and MASHA LUND a/k/a MALU LUND (collectively, “Plaintiffs”), by and through their undersigned counsel, as and for their Complaint (“Complaint”) against defendants CONTROVERSY, LLC d/b/a CLUB CONTROVERSY and MARK LATORRE (collectively “Defendants”) respectfully allege as follows:

1. Shortly after filing the instant lawsuit complaints and waiver of service packets were mailed to the primary place of business of the Defendants. The business location where the packets were sent is known to be in operation.
2. Those service packets were delivered and have not been returned to counsel.

3. The Defendants have not responded despite receiving copies of service documents and complaints.

4. After discussing with the front office clerk Plaintiff now seeks an additional 60 days to effectuate service of summons by way of personal service of sealed summons.

WHEREFORE, Plaintiff respectfully requests an additional 60 days to complete service on the Defendants.

9/13/19

Respectfully submitted,

s/Louis J. Kroeck
Attorney for Plaintiff

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**Pro Hac Vice Application Forthcoming*